

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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Fishbowl Solutions, Inc.,

Case No.: 0:21-cv-00794 (SRN/BRT)

Plaintiff,

vs.

The Hanover Insurance Company,

Defendant.

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**DEFENDANT THE HANOVER INSURANCE COMPANY'S  
MOTION FOR SUMMARY JUDGMENT**

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Defendant The Hanover Insurance Company ("Hanover"), by and through their counsel, hereby moves this Court pursuant to Rule 56 of the Federal Rules of Civil Procedure for Summary Judgment on the grounds that, as a matter of law, there is no coverage under the Data Breach Coverage Form of the Technology Professional Liability Policy issued by Hanover to Plaintiff Fishbowl Solutions, Inc. for Fishbowl's claimed loss.

This Motion is based on the provisions of Rule 56 of the Federal Rules of Civil Procedure, Hanover's Memorandum of Law in Support of its Motion for Summary Judgment, the Declaration of Scott G. Johnson and attached exhibits,

the Declaration of Jack Smith and attached exhibit, and all of the files, records, and proceedings herein.

June 7, 2022

Respectfully submitted,

**ROBINS KAPLAN LLP**

By: /s/ Scott G. Johnson

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